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Attorneys for Defendant
BEIJING ASIACOM INFORMATION
TECHNOLOGY CO., LTD. erroneously sued as
BEIJING ASIACOM TECHNOLOGY CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JINJU ZHANG, an individual,
Plaintiff,

v.

BELIN YUAN, an individual; HONG
LIN, an individual; CAMIWELL, INC., a
California corporation; CAMIWELL,
INC. (CANADA), a Canadian
corporation; BEIJING ASIACOM
TECHNOLOGY CO., LTD., a Chinese
corporation; ASIACOM AMERICAS,
INC., a Virginia corporation; BANK OF
AMERICA CORPORATION, a National
Association; and DOES 1 to 20, inclusive,
Defendants.

Case No. 5:23-cv-5818-CRB

**DECLARATION OF GUILIN GU IN
SUPPORT OF DEFENDANT BEIJING
ASIACOM INFORMATION
TECHNOLOGY CO., LTD.'S MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION, INSUFFICIENT
SERVICE AND FAILURE TO STATE A
CLAIM**

Time: 10:00 a.m.
Date: April 5, 2024
Judge: Hon. Charles R. Breyer
Courtroom: 6—17th Floor

1 I, Guilin Gu, declare as follows:

2 1. I am a General Manager and Director of defendant Beijing Asiacom
3 Information Technology Co., Ltd. ("Beijing Asiacom"). I am familiar with and have personal
4 knowledge of the matters set for in this declaration, and, if called to do so, could and would
5 testify competently thereto, except where I state that my knowledge is based upon information
6 and belief, and as to those matters, I understand and believe them to be true.

7 2. Beijing Asiacom is a Chinese corporation headquartered in China. It is a
8 publicly-traded corporation listed on a Chinese stock exchange.

9 3. Beijing Asiacom has no offices in the United States. It has no employees
10 in the United States. It generates no revenue in the United States. It does not advertise products
11 or services in the United States.

12 4. The only subsidiary of Beijing Asiacom in the United States is Asiacom
13 Americas Inc., a company that is incorporated in the State of Virginia.

14 5. Beijing Asiacom has no registered agent in the United States. No one
15 named Ying Ding is employed by it or authorized to accept service of process on its behalf.
16

17 I declare under penalty of perjury under the laws of United States of America that
18 the foregoing is true and correct. Executed on February 27, 2024.

19
20 /s/ Guilin Gu
21 GUILIN GU
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ECF SIGNATURE ATTESTATION

In accordance with Local Rule 5-1, the filer of this document hereby attests that the concurrence of the filing of this document has been obtained from the other signatories hereto.

Dated: February 28, 2024

LUBIN OLSON & NIEWIADOMSKI LLP

By: /s/ Jonathan E. Sommer

Jonathan Sommer
Attorneys for Defendant
BEIJING ASIACOM INFORMATION
TECHNOLOGY CO., LTD.